

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-182-E

South Carolina Energy Freedom Act (H.3659))
 Proceeding Initiated Pursuant to S.C. Code Ann.)
 Section 58-40-20(C): Generic Docket to (1))
 Investigate and Determine the Costs and Benefits)
 of the Current Net Energy Metering Program and)
 (2) Establish a Methodology for Calculating the)
 Value of the Energy Produced by Customer-)
 Generators)
 _____)

**CERTIFICATE OF
SERVICE**

This is to certify that I have caused to be served on this day one (1) copy of **DOMINION ENERGY SOUTH CAROLINA, INC.'S FIRST SET OF DISCOVERY REQUESTS** via electronic mail and U.S. First Class Mail upon the persons named below, addressed as follows:

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s/ Matthew W. Gissendanner

This 23rd day of October, 2020.

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THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
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South Carolina Energy Freedom Act (H.3659))
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DOMINION ENERGY
SOUTH CAROLINA,
INC.’S FIRST SET OF
DISCOVERY REQUESTS

TO: SOUTH CAROLINA COASTAL CONSERVATION LEAGUE, SOUTHERN ALLIANCE FOR CLEAN ENERGY, UPSTATE FOREVER, AND VOTE SOLAR

Pursuant to S.C. Code Ann. Regs. §§ 103-833 and 103-835, and Rule 36 of the South Carolina Rules of Civil Procedure (“SCRCP”), Dominion Energy South Carolina, Inc. (“DESC”), by and through its undersigned counsel, requests that South Carolina Coastal Conservation League, Southern Alliance For Clean Energy, Upstate Forever, and Vote Solar (collectively, the “Intervenors”) answer the corresponding interrogatories under oath and produce all documents or other materials responsive to the corresponding requests for production (collectively, the “Discovery Requests”) within twenty (20) days of the date of service hereof to the address of the undersigned, set forth below.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information, documents, and other materials be provided to the undersigned in the format as requested.

2. That all responses to the below Discovery Requests be labeled using the same numbers as used herein.

3. That if the requested information, documents, or other materials are found in other places or in other exhibits, reference not be made to those, but, instead, that the information, documents, or other materials be reproduced and placed in the responses to the interrogatory or requests for production in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications be directed to the undersigned.

5. Provide copies of the information responsive to each Discovery Request in native electronic working format with all data (including source data) and formulas intact in an unprotected and unlocked form to allow auditing and verification of inputs, methods, and formulas.

6. That each Discovery Request be reproduced at the beginning of the response thereto.

7. That the Intervenors provide the undersigned with responses to the Discovery Requests as soon as possible, but not later than twenty (20) days from the date of service hereof.

8. If the response to any Discovery Request is that the information requested is not currently available, state why the information is not currently available and when the information requested will become available.

9. The Discovery Requests be deemed continuing so as to require the Intervenors to supplement or amend its responses as any additional information, documents, or other materials become available up to and through the date of hearing.

10. If a privilege not to answer is claimed, identify and describe each matter as to which privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

In the event that a claim of privilege is raised pursuant to a common interest, provide the common interest agreement or joint defense agreement upon which the privilege is raised.

11. If a refusal to answer is based upon the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

12. Answer based upon the entire knowledge of the Intervenors, including information in the possession of the Intervenors, their respective officers, members, parents, subsidiaries, directors, consultants, representatives, agents, experts, and attorneys, if any.

13. If any Discovery Request cannot be answered in full, answer to the extent possible and specify the reasons for Your inability to provide a complete answer.

14. Please provide responses to the Requests electronically. To the extent this is impracticable, the responses, including any responsive documents, should be provided at the address of the undersigned, set forth below, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. The term “Docket” shall mean Commission Docket No. 2019-182-E.
2. The term “communication(s)” when used in these Discovery Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.
3. The terms “Intervenors,” “You,” and “Your” shall mean South Carolina Coastal Conservation League, Southern Alliance For Clean Energy, Upstate Forever, and Vote Solar, together with their respective employees, agents, consultants, experts (including Frank Hefner), subsidiaries, affiliates, parent, and other operational or functional units and all officers, directors,

owners, members, employees, agents, and representatives of these entities. The terms also include all other persons acting on behalf of the Intervenors.

4. The term “DESC” shall mean Dominion Energy South Carolina, Inc., formerly South Carolina Electric & Gas Company, together with its employees, agents, consultants, experts, subsidiaries, affiliates, parents, and other operational or functional units and all officers, directors, owners, members, employees, agents, and representatives of these entities. It also includes all other persons acting on behalf of DESC.

5. The terms “document(s)” shall mean all written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, books, records, letters, photographs, correspondence, communications, electronic mail, text messages, social media records, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements, summaries, opinions, studies, analyses, evaluations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, CD-ROMs, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic, or mechanical means, any notes or drafts relating to any of the foregoing, and any other documents as defined in Rule 34 of the SCRCF of any kind in Your possession, custody or control or to which You have access or

knowledge of its existence. The above list is not meant to be exhaustive but to demonstrate the breadth of the items that may be considered “documents.”

6. The terms “identify” or “identity” used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the time in question. If the person was an officer, director, trustee, commissioner, or employee, also state the job title and areas of responsibility.

7. The terms “identify” or “identity” used with reference to a writing means to state the date, author, type of document (e.g., letter, memorandum, telegram, chart, note, application, etc.), or other means of identification, and its present location or custodian. If any such document is no longer in Your possession or subject to Your control, state what disposition was made of it.

8. The term “person” shall mean any individual, partnership, firm, association, corporation, government agency, or other business or legal entity.

9. The terms “relating to,” “relate to,” and “related to” mean directly or indirectly, expressly or implied, mentioning, describing, pertaining to, being connected with, or reflecting upon the subject matter of the specific request.

10. The term “Study” means the study and related numbers attached as Exhibit A and Exhibit B to the Testimony.

11. The term “Testimony” means Witness Hefner’s direct testimony submitted in this Docket.

12. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of these Discovery Requests any information which might otherwise be construed outside their scope.

INTERROGATORIES

1. Identify all documents known to You that were referred to or relied upon in preparing the Study.
2. Identify all documents (other than the Study) known to You that contain estimates of the economic impact of solar energy in the state of South Carolina for calendar year 2018 or calendar year 2019.
3. Identify all documents known to You that contain the actual proportions of job sectors (manufacturing, retail, etc.) into which solar energy jobs are divided in South Carolina, rather than the “national level” proportions utilized in Exhibit B of the Testimony.
4. Identify all documents known to You that contain an analysis of the “net” or “but-for” economic impact of solar energy in South Carolina, including those that refute the benefits recited in the Testimony.
5. Identify all documents known to You that contain a forward-looking analysis of the economic impact of solar energy in South Carolina.
6. Identify all documents known to You that contain the “regional impact research” cited in the Note to Exhibit B of the Testimony.
7. Describe with detail and specificity the basis, including all studies, data, and supporting assumptions, for the Study’s statement on Page 4 of Exhibit A of the Testimony that “solar photovoltaic energy will be cheaper than all other technologies.”
8. Identify all regulatory bodies known to You that quantify the value of health benefits of solar energy when setting rates for net energy metering programs.
9. Identify all regulatory bodies known to You that quantify the value of emission reductions due to solar energy when setting rates for net energy metering programs.

10. Identify all regulatory bodies known to You that quantify the value of induced economic benefits of solar energy (both direct and indirect) when setting rates for net energy metering programs.

11. Describe with detail and specificity how You define the following terms for purposes of the Study:

- i. Residential
- ii. Non-Residential
- iii. Utility-Scale
- iv. Installation and Project Development
- v. Wholesale Trade and Distribution
- vi. Operations and Maintenance
- vii. Manufacturing

12. Describe with detail and specificity how the job numbers in the Study guard against double-counting jobs that may perform a variety of functions or perform the same function in a variety of sectors, (i.e., Residential and Non-residential, Manufacturing and Operations and Maintenance, etc.).

13. Describe with detail and specificity the method by which You allocated solar proportions of solar energy jobs across sectors (manufacturing, retail, etc.) in the Study.

14. Describe with detail and specificity why the method by which You calculated “impact across market segments” in Exhibit B of the Testimony was a “reasonable method.”

15. Describe with detail and specificity the basis upon which the average salary numbers utilized by the Study are based.

16. Describe with detail and specificity how the Study accounts for the opportunity costs of investing in solar energy, or the “net” economic impact of solar energy in South Carolina.

17. Describe with detail and specificity how the Study accounts for the payment of incentives (whether tax or otherwise) to promote solar adoption when calculating the economic impact of solar energy in South Carolina.

18. Describe with detail and specificity how the Study accounts for impacts to the rates paid by non-solar customers as a result of the adoption of solar energy in South Carolina.

19. Describe with detail and specificity in what ways You believe battery storage will impact solar-related jobs in the NEM context in South Carolina in the next 10 years.

20. Describe with detail and specificity the duration of time the annual benefits detailed in the Study will persist and what are the necessary assumptions on level of solar adoption and load growth in each year needed to assume this persistence of savings.

21. Describe with detail and specificity any assumptions you include in Your analysis regarding the loss of jobs related to other forms of technology and innovation that are not pursued in favor of emphasizing adoption of solar technologies to meet load needs.

REQUESTS FOR PRODUCTION

1. Produce all documents identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.
2. Produce all communications identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.

Respectfully Submitted,

s/ Matthew W. Gissendanner

K. Chad Burgess, Esquire

Matthew W. Gissendanner, Esquire

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*Attorneys for Dominion Energy South Carolina,
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Cayce, South Carolina
This 23rd day of October, 2020.